

UNITED STATES BANKRUPTCY COURT

**UNITED STATES COURTS
SOUTHERN DISTRICT OF TEXAS
FILED**

JUL 25 2013

IN RE:

David J. Bradley, Clerk of Court

Jimmy Lee & Ann Thi Hadley

BANKRUPTCY CASE NUMBER

(Debtor),

09-36858-H1-13

**SUPPLEMENT TO
PETITION FOR UNCLAIMED FUNDS
REQUEST TO CANCEL HEARING**

Dilks & Knopik, LLC, Attorney-in-Fact for Jimmy Lee & Ann Thi Hadley petitioned the Court for \$2,390.40 being held in the Registry of the Clerk, U.S. Bankruptcy Court as unclaimed funds for Jimmy Lee & Ann Thi Hadley, creditor on June 13, 2013 (Docket # 112). Following the docketing of this motion, a second Motion to Pay Unclaimed Funds was filed by Keys Research on June 27, 2013 (Docket # 113).

We believe that, due to the docketing of competing motions, this court has scheduled a hearing on Docket # 112 and # 113 to take place on July 31, 2013 at 10:00 a.m. (Docket #115). The required Certificate of Service of Notice for Dilks & Knopik, LLC has been entered as Docket #118.

Dilks & Knopik, LLC has spoken with our clients, Jimmy Hadley and Ann Thi Hadley in regard to the competing claim. Mr. Hadley and Ms. Hadley have provided us with a letter, marked as "Exhibit A", stating that:

- 1) It was an error in judgment to hire Keys Research and Dilks & Knopik,**

LLC in regard to this claim; this error was made because Mr. and Ms.


**Unclaimed.fds
06/23/98**

Hadley thought that Keys Research was speaking to them about a separate claim.

- 2) That both Jimmy Hadley and Ann Hadley have spoken with Keys Research to inform them that they do not represent Mr. Hadley or Ms. Hadley on their claim.
- 3) That Dilks and Knopik, LLC will represent them on their claim.

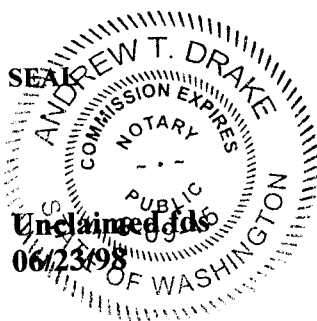
As we believe that the hearing has been scheduled to resolve the multiple filings for the same funds and no other facts are in dispute, based on the above letter from Mr. and Ms. Hadley, and because the costs of a hearing would considerably diminish the amount of funds to which Mr. and Ms. Hadley would have access, we respectfully request that the hearing, scheduled for July 31, 2013 at 10:00 a.m. be cancelled and that the Proposed Order, included with the Petition for Unclaimed Funds filed previously as Docket # 112 be entered.

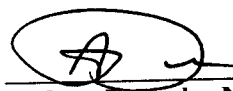
Dated: July 23, 2013



Brian J. Dilks, Managing Member
Dilks & Knopik, LLC
35308 SE Center St, Snoqualmie, WA 98065
(425)-836-5728

On 7/23/2013 before me, Brian J. Dilks, personally appeared, personally known to me (or proved to me on the basis of satisfactory evidence) to be the person (s) whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his signature on the instrument the person, or entity upon behalf of which the person acted, executed the instrument. WITNESS my hand and official seal.





Andrew T. Drake, Notary Public
My commission expires: August 9, 2015
Notary in and for the State of Washington

**CERTIFICATE OF SERVICE OF SUPPLEMENT TO APPLICATION
ON U.S. ATTORNEY & U.S. TRUSTEE**

Notice is hereby given that on July 23, 2013 a copy of the Supplement to Application for Release of Unclaimed Funds was served on the U.S. Attorney and U.S. Trustee for the Southern District of Texas by U.S. Mail at the following addresses:

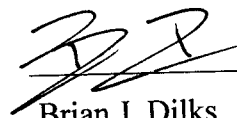
U.S. Attorneys Office
P.O. Box 61129
Houston, TX 77208

U.S. Trustees Office
515 Rusk Ave., Ste. 3516
Houston, TX 77002

Notice is further given that on July 23, 2013 a copy of the Supplement to Application for Release of Unclaimed Funds was served on the Case Trustee by Electronic Mail at the following addresses:

David G Peake
Case Trustee
court@peakech13trustee.com

Dated: July 23, 2013



Brian J. Dilks
Dilks & Knopik, LLC
Attorney in Fact for
Jimmy Lee & Ann Thi Hadley

7/19/13

To whom It May Concern:

Concerning Jimmy Hadley & Ann Hadley, We are in agreement that we both made a mistake in our judgement in hiring both Keys Research and Diks & Knopik LLC, we thought they were different firms. We both have spoken with Michele of Keys Research and informed her that we are / have withdrawn the motion to have them represent us in this claim. We (Jim Hadley / Ann Hadley) are in agreement that Diks & Knopik LLC (Brian Baguhn) will represent us. I have spoken with Brian, and agreed to write this letter of Intent concerning Myself and Ann Hadley

Any Questions or Concerns please feel to call

Jim Hadley 281-781-4833 or

Ann Hadley 281-781-4832

Exhibit A

DILKS & KNOPIK, LLC

"When Success Matters"

July 23, 2013

United State District Court
Southern District of Texas
Attn: Intake
PO Box 61010
Houston, TX 77208

UNITED STATES COURTS
SOUTHERN DISTRICT OF TEXAS
FILED

JUL 25 2013

David J. Bradley, Clerk of Court

RE: Application for the Release of Unclaimed Funds – Supplement to filing

Dear Sir or Madam:

I have previously applied to the US Bankruptcy Court, Southern District of Texas for the release of the unclaimed monies due and owing to Jimmy Lee & Ann Thi Hadley for the amount of \$2,390.40. This is from the Bankruptcy of Jimmy Lee & Ann Thi Hadley and Case No. 09-36858-H1-13 (Docket # 112).

A hearing for this case has been scheduled to take place on July 31, 2013 at 10:00 a.m. (Docket #115). Our required Certificate of Service of Notice in regard to this hearing has been entered on the Docket (Docket #118).

With this supplement, we seek to resolve the competing motion issue and request cancellation of the scheduled hearing.

Thank you for your attention to this matter.

Sincerely,



Brian J. Dilks
Managing Member

35308 SE Center St
Snoqualmie, WA 98065

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Email admin@dilksknopik.com